

1 Thomas Myers (CA SBN 120674)
2 myers@smithmyerslaw.com
3 SMITH & MYERS LLP
4 800 Wilshire Boulevard, Suite 800
5 Los Angeles, California 90017
6 Telephone: (213) 613-2380
7 Facsimile: (213) 613-2395

8 Angel J. Valencia (*Pro Hac Vice Application to be Filed*)
9 ajv@nrtw.org
10 Milton L. Chappell (*Pro Hac Vice Application to be Filed*)
11 mlc@nrtw.org
12 c/o NATIONAL RIGHT TO WORK LEGAL
13 DEFENSE FOUNDATION, INC.
14 8001 Braddock Road, Suite 600
15 Springfield, Virginia 22151
16 Telephone: (703) 321-8510
17 Facsimile: (703) 321-9319

18 Attorneys for Plaintiff and the Classes She Seeks to Represent

19 **UNITED STATES DISTRICT COURT**

20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 **IRENE SEAGER**, individually and as) Case No: 2:19-cv-00469
22 representative of the requested classes,)
23 Plaintiff,) **NOTICE OF RELATED
24) CIVIL CASES**
25 v.)
26 **UNITED TEACHERS LOS)
27 ANGELES; LOS ANGELES)
28 UNIFIED SCHOOL DISTRICT;)
XAVIER BECERRA, in his official)
capacity as Attorney General of)
California,)
Defendants.)**

1 **NOTICE OF RELATED CIVIL CASES**

2 **AND NOW** comes Plaintiff Irene Seager, by and through her undersigned
3 attorneys, and submits a Notice of Related Civil Cases pursuant to Civil Local
4 Rule 83-1.3.1 as follows:

5 A case arising from a similar fact pattern is currently before the
6 consideration of this Court in the matter of *McCain v. Ventura County Federation*
7 *of College Teachers, AFT Local 1828, AFL-CIO*, 19-00228 (PA-GJS). In *McCain*,
8 as in the instant case, the plaintiff attempted to revoke a previously authorized dues
9 deductions authorization in light of *Janus v. AFSCME, Council 31*, 138 S.Ct. 2448
10 (2018). After being denied his request, Plaintiff Michael McCain filed a civil
11 action against his labor union and employer for violating his First and Fourteenth
12 Amendment rights, as recognized by the U.S. Supreme Court. *Janus*, 138 S.Ct. at
13 2486. In *McCain*, the plaintiff also challenges a labor union's practice of limiting
14 an employee's ability to revoke a previously authorized dues deductions
15 authorization to a 15-day annual window period as a violation of his First
16 Amendment rights.

17 As in *McCain*, the labor union denied Plaintiff Seager's request to revoke
18 her previously authorized dues deductions authorization. In the instant case,
19 Plaintiff Seager is also challenging her labor union's practice of limiting her ability
20 to revoke a dues deductions authorization to a yearly 30-day window period. Both
21 cases invoke 42 U.S.C. § 1983, as well as the First and Fourteenth Amendments to

the United States Constitution.

SMITH & MYERS LLP

By /s/ Thomas Myers
Thomas Myers

Ángel J. Valencia
(*Pro Hac Vice* to be applied for)
Milton L. Chappell
(*Pro Hac Vice* to be applied for)

**Attorneys for Plaintiff Irene Seager and
the Classes She Seeks to Represent**

SMITH & MYERS LLP
800 Wilshire Boulevard, Suite 800
Los Angeles, California 90017
Tel: (213) 613-2380 Fax: (213) 613-2395